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**MEMO ENDORSED**

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March 3, 2023

Hon. Edgardo Ramos  
United States District Court  
U.S. Courthouse  
40 Foley Square  
New York, New York 10007

The application for appointment of associate counsel Clara S. Kalhous, Esq. is granted.

SO ORDERED.



Edgardo Ramos, U.S.D.J.  
Dated: 3/20/2023

New York, New York

Re: United States v. Lloyd, et al  
23 Cr. 38 (ER)

Dear Judge Ramos:

I am the assigned CJA counsel for defendant Derrick Reynolds in the above referenced case. I write today to respectfully request authorization for the expenditure of CJA funds to retain the services of Clara S. Kalhous, Esq. as associate counsel to assist me in defending Mr. Reynolds. Attorney Kalhous has assisted several S.D.N.Y. counsels, including me, in the past as an associate counsel. Just recently Kalhous served as associate counsel to me in a matter before Your Honor. (United States v. Almaleh, 17 Cr. 25). Ms. Kalhous' experience and adeptness at reviewing digital discovery and preparing legal memoranda makes her an invaluable addition to Mr. Reynolds' defense. I also note that I fully expect to be engaged in trial preparation for an anticipated five week long multi-defendant trial scheduled for April 1<sup>st</sup> in the Eastern District of New York. Hence, Ms. Kalhous' timely appointment will facilitate the review of discovery expected to be produced shortly.

Should Your Honor be inclined to grant this application it is respectfully requested that Ms. Kalhous be approved at the rate of \$110.00 per hour for an initial period of 60 hours with leave to request additional funding should the need arise. Of course, every effort will be made to avoid duplication of the work load.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,



Richard H. Rosenberg

cc.: Clara Kalhous, Esq.